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13 AUTOMOTIVE GROUP, INC., DOLLAR RENT A
CAR, INC. and DTG OPERATIONS, INC.
14

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

17 SANDRA McKINNON and KRISTEN
TOOL, individually and on behalf of all others
18 similarly situated,

19 Plaintiffs,

20 v.

21 DOLLAR THRIFTY AUTOMOTIVE
GROUP, INC. d/b/a DOLLAR RENT A CAR;
DOLLAR RENT A CAR, INC.; DTG
22 OPERATIONS, INC. d/b/a DOLLAR RENT
A CAR; and DOES 1-10, inclusive,

23 Defendants.
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Case No. 12-cv-04457- SC

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO: (1) ENLARGE TIME TO
RESPOND TO AMENDED MOTION FOR
CLASS CERTIFICATION AND MOTION
TO GRANT REQUEST FOR
INTERVENTION AND TO FILE
FOURTH AMENDED COMPLAINT; AND
(2) CONTINUE HEARING DATE**

Current Hearing Date: October 30, 2015

Time: 10:00 a.m.

Judge: Hon. Samuel Conti

Courtroom: 1

[Complaint Filed: August 24, 2012]

Pursuant to Fed. R. Civ. P. 6(b)(1) and 16(b)(4); Civil L.R. 7-12, 6-1(b), and 6-2; and the Supporting Declaration of Daniel J. Weiss, it is hereby stipulated by and between Plaintiffs and Defendants (together the “Parties”), through their respective counsel, as follows:

WHEREAS, on July 27, 2015, the Court denied Plaintiffs’ Motion for Class Certification and ordered that Plaintiffs could file a new motion for class certification within 30 days, by August 26, 2015 (ECF No. 132);

WHEREAS, on August 26, 2015, Plaintiffs filed a Motion to Grant Request for Intervention and to File Fourth Amended Complaint (ECF Nos. 133, 134) (the “Intervention Motion”) and an Amended Motion for Class Certification (the “Class Certification Motion”);

WHEREAS, Defendants’ responses to both of Plaintiffs’ motions are currently due by September 9, 2015;

WHEREAS, Defendants intend to respond to the Intervention Motion separately from the Class Certification Motion and desire to set different briefing schedules for those motions;

WHEREAS, Defendants submit they require discovery to respond to the Class Certification Motion, including depositions of the two newly proposed plaintiffs, which must be coordinated with counsel’s and the witnesses’ schedules, and depending on Defendants’ response, Plaintiffs may require discovery, including depositions of any Declarants proffered by Defendants (both parties reserving the right to object to such discovery);

WHEREAS, the grounds for this stipulation are further set forth in the accompanying Declaration of Daniel J. Weiss.

NOW, THEREFORE, the Parties stipulate as follows:

1. That the Court enlarge the time for Defendants to respond to Plaintiffs’ Intervention Motion (ECF No. 134) to September 23, 2015, and the time for Plaintiffs to reply to Defendants’ response to the Intervention Motion to October 14, 2015.

2. That the Court enlarge the time for Defendants to respond to Plaintiffs’ Class Certification Motion (ECF No. 133) to October 14, 2015, and the time for Plaintiffs to reply to Defendants’ response to the Class Certification Motion to November 19, 2015.

1 3. That the Court continue the hearing date on both motions to December 11, 2015 or
2 another date available to the Court and counsel for the Parties.

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5 Dated: September 3, 2015

JENNER & BLOCK LLP

6 By: /s/ Daniel J. Weiss

7 DANIEL J. WEISS

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2 Dated: September 3, 2015

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Melinda Basker and Chanh Tran

21 **Filer's Attestation:** Pursuant to L.R. 5-1(i)(3), Daniel J. Weiss hereby attests that concurrence in
22 the filing of this document has been obtained from all signatories.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

1. Defendants' Response to Plaintiffs' Motion To Grant Request For Intervention And To File Fourth Amended Complaint is due on September 23, 2015, and Plaintiffs' reply thereto is due on October 14, 2015.

2. Defendants' Response to Plaintiffs' Amended Motion For Class Certification is due on October 14, 2015, and Plaintiffs' reply thereto is due on November 19, 2015.

3. The date of the hearing for both motions is continued to December 11, 2015.

Dated: September 4, 2015


The Hon. Samuel Conti
United States District Judge